

Exhibit A

1411 K St. NW, Suite 1400
Washington, DC 20005



THE
CAMPAIGN
LEGAL CENTER

Tel: 202.736.2200
Fax: 202.736.2222

July 16, 2017

John M. Gore, Esq.
Deputy Assistant Attorney General
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave.
Washington, D.C. 20530

Via Email

Dear Mr. Gore:

As counsel for the Veasey-LULAC private plaintiffs in *Veasey, et al. v. Abbott, et al.*, No. 2:13-cv-00193 (S.D. Tex.), we write to inquire in what capacity the United States addressed the cause of action alleging discriminatory purpose in its recent filing titled “United States Brief Regarding Remedies,” Doc. 1052. Even though the United States withdrew its claim alleging discriminatory purpose, *see* Docs. 1001, 1022, fully half of its brief was devoted solely to that issue, including a major section headed “II. S.B. 5 PRECLUDES ENTRY OF AN INJUNCTION OR DECLARATORY JUDGMENT ON THE DISCRIMINATORY PURPOSE CLAIM.” Moreover, several statements in this Brief contradict positions taken by the United States in previous filings in this case.

Having withdrawn its claim as to discriminatory purpose, the United States could not be speaking as a plaintiff. It is not a defendant, nor, as a party in the overall case, can it speak as *amicus curiae*. In previous filings in this matter, the United States has refrained from addressing claims raised solely by other parties, such as the poll tax claim.

We believe it was improper for the United States to address the discriminatory purpose claim and we believe this should not be repeated.

We would appreciate your response to two questions:

1. In what capacity did the United States address the discriminatory purpose claim in its opening brief on remedies?
2. If you believe it was not improper to do so, what is your basis for that belief?

Thank you for your attention.

[Signatures on next page]

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Very truly yours,

J. Gerald Hebert
Danielle M. Lang
Campaign Legal Center
1411 K Street NW Suite 1400
Washington, DC 20005

Chad W. Dunn
K. Scott Brazil
Brazil & Dunn
4201 Cypress Creek Pkwy., Suite 530
Houston, Texas 77068

Armand Derfner
Derfner & Altman
575 King Street, Suite B
Charleston, S.C. 29403

Neil G. Baron
Law Office of Neil G. Baron
914 FM 517 W, Suite 242 Dickinson,
Texas 77539

David Richards
Richards, Rodriguez & Skeith, LLP
816 Congress Avenue, Suite 1200
Austin, Texas 78701

Counsel for Veasey/LULAC Plaintiffs

Luis Roberto Vera, Jr.
Law Office of Luis Roberto Vera Jr. 111
Soledad, Ste 1325 San Antonio, TX 78205

Counsel for LULAC

Cc: T. Christian Herren, Jr., Esq.
Richard Dellheim, Esq.
Daniel J. Freeman, Esq.
Abe Martinez, Esq.